

2/1 Hazardous Waste Management
1985 EPA RCRA Inspection

27 March 1985

Mr. Michael J. Sanderson
Chief, Air and Waste Compliance Branch
U.S. Environmental Protection Agency, Region VII
324 East Eleventh Street
Kansas City, Missouri 64106

Enclosure: SMP 190-70-10, Page G-3, revised 27 March 1985

REGISTERED MAIL - RETURN RECEIPT

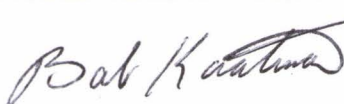
Dear Mr. Sanderson:

The enclosure is provided per the terms of our letter dated 21 March 1985, which was written in response to Ms. Jo Lynne Moore's RCRA compliance inspection conducted 12 March 1985.

Should you have any questions or comments, please advise.

Sincerely,

MCDONNELL AIRCRAFT COMPANY



R. H. Kaatman, Acting Supervisor
Environmental Compliance
Dept. 891C, Bldg. 305

RHK:bem

EC: Mike Duvall, Mo.DNR, SLRO
Art Groner, Mo.DNR, HWMP

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AIR AND HAZARDOUS MATERIAL
DIVISION

MCDONNELL DOUGLAS



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RCRA RECORDS CENTER

MCDONNELL AIRCRAFT COMPANY

Box 516, Saint Louis, Missouri 63166 (314) 232-0232

REGISTERED MAIL - RETURN RECEIPT

2/1 Hazardous Waste Management
1985 EPA RCRA Inspection

21 March 1985

Mr. Michael J. Sanderson
Chief, Air and Waste Compliance Branch
U.S. Environmental Protection Agency, Region VII
324 East Eleventh Street
Kansas City, Missouri 64106

Dear Mr. Sanderson:

This is in response to the notice of violation issued to McDonnell Douglas Corporation (MOD000818963) during Ms. Jo Lynne Moore's RCRA compliance inspection conducted 12 March 1985.

We appreciate the extension of time granted to respond to the discrepancies discovered during the inspection.

The following actions are proposed for your concurrence:

1. 264.51(d) - list home and office address of emergency coordinators

Title 40 §264.52(d) does state the following: "The plan must list names, addresses, and phone numbers (office and home) of all persons qualified to act as emergency coordinator ... "

This was a simple problem of interpretation by personnel preparing our Part B application. While home and office phone numbers were listed, home addresses were not.

We will submit an updated list of emergency coordinators, including home addresses, to your office and the Missouri Department of Natural Resources.

2. 264.16(c) - ensure annual personnel training

This has been a difficult problem, due mainly to the size of this facility and number of employees requiring annual hazardous waste training. We have taken steps to improve upon the current training system, especially recordkeeping aspects, including computerizing this information. Our current plans are to hire a qualified individual who will ensure that all aspects of §264.16 Personnel Training are complied with. It appears at this time that this person will be joining our staff in the near future.

3. 264.16(d)(1) and (2) - include job description for identified positions including skill, education, etc.

While this information is maintained at this facility, it is not easily accessible, again due to the many employees requiring training. In 1984, for example, over 750 employees were trained.

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**AIR AND HAZARDOUS MATERIALS
DIVISION**

With your permission, we would like to keep in our department (891C) general job descriptions for each main job classification requiring hazardous waste training. This should satisfy the requirements of the law while allowing for quick on-site review of this information. The general job descriptions would include: (1) example of duties; (2) educational and/or training requirements; (3) experience required; and (4) occupation or operation requirement.

4. 264.175 - repair curbing in tank containment areas H19 and H20 and H1-H6

This repair will be accomplished as soon as weather and manpower permits, but no later than 01 June 1985.

5. 264.35 - inadequate aisle space in drum storage areas - min. of 18"

Even though \$264.35 and MDC's Part B application do not specifically require 18" of aisle space, it was part of the original design drawings for this shelter.

We will repaint the aisle lines and reinforce to the operator of this facility that adequate aisle space must be maintained at all times.

6. 264.173 - keep all waste containers closed with rims in place

This is another area where both the operator and person performing the daily shelter inspections will have to pay closer attention. We have also asked the operators at the beginning and end of each of their work shifts to take time to ensure the security and integrity of their shelters.

Again, we appreciate the extension of time for reply. Your Ms. Jo Lynne Moore is commended for her cooperation and professional approach during this inspection.

We will begin immediately to take steps to remedy the above-mentioned problems. Our future manpower additions will help tremendously in resolving discrepancies of this nature.

Should you have any questions or comments, feel free to contact us at any time.

Sincerely,

MCDONNELL AIRCRAFT COMPANY



R. H. Kaatman, Acting Supervisor
Environmental Compliance
Dept. 891C, Bldg. 305



CONCUR: J. C. Patterson, Branch Manager
Environmental Compliance
Dept. 891C, Bldg. 305

RHK:bem

EC: Mike Duvall, Mo.DNR, SLRO
Art Groner, Mo.DNR, HWMP

ATTACHMENT I
EMERGENCY COORDINATORS

The following is a tabulation of titles and the personnel filling these positions at this time. Addresses and telephone numbers have been provided for use during "off duty" hours.

<u>Title</u>	<u>Name</u>	<u>Off-Duty Telephone No.</u>	
1. Branch Manager, Dept. 891C Environmental Compliance	J. C. Patterson 11946 Spruce Haven St. Louis, MO 63146	(314) 567-1336	R-3
			R-1
2. Manager, Dept. 890 Plant Design and Maintenance Engineering	R. E. Bishop 8260 Audrain St. Louis, MO 63121	(314) 389-0467	R-2
3. Director, Dept. 890 Plant Engineering	E. M. Myers 11906 Spruce Haven St. Louis, MO 63146	(314) 432-2107	R-2